

## **Exhibit A**

## David Rothstein

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**From:** Helms, Kathy Dudley <Kathy.Helms@ogletreedeakins.com>  
**Sent:** Saturday, April 18, 2015 12:24 AM  
**To:** David Rothstein; KThomas@gsblaw.net  
**Subject:** RE: Irani

David,

We produced those documents on February 5. None of those documents are new to you either as they have all been produced in previous litigation.

Kathy

### **Kathy Dudley Helms | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.**

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**From:** David Rothstein [<mailto:drothstein@rothsteinlawfirm.com>]  
**Sent:** Friday, April 17, 2015 9:27 PM  
**To:** [KThomas@gsblaw.net](mailto:KThomas@gsblaw.net); Helms, Kathy Dudley  
**Subject:** Irani

Dear Kathryn and Kathy. In light of Dr. Taylor's deposition from earlier this week and the new documents I was able to find in preparation for the depositions, I may need to amend the complaint again, because I believe that there are three additional contracts that need to be included in Dr. Irani's claims for breach of contract, third-party beneficiary breach of contract, and tortious interference. Those contracts would be (1) the Affiliation Agreement between Palmetto Health and USC (Exhibit 3 to Dr. Taylor's deposition), (2) the Department of Orthopaedic Surgery Residency Manual (Exhibit 2), and (3) the PLA between Palmetto Health and University Specialty Clinics—Orthopaedic Surgery (Exhibit 4). I suppose the causes of action in the Amended Complaint could be read to include these three contracts, but if you disagree, I will need to file a second amended complaint. Please let me know your position on this as soon as possible. Thank you. Dave.

David E. Rothstein

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(Also licensed in N.C.)

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